



Joint compounds  
Zonolite insulation

Gold Bond (National  
W.R. Grace

\*Jerome Dasky, 564 W. Salzburg Road, Auburn, MI 48611 (517)  
662-  
6908

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Coon Devisser; Owens-Corning Fiberglas; Hollinger &  
Co.; Bay City Hardware; Jennison Hardware

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and	
block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
Thermobestos pipecovering and	
block	Johns-Manville
352 cement	Johns-Manville
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Zonolite insulation	W.R. Grace

\*Ralph Machleit, 11753 Grass Lake Road, Barryton, MI 49305

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Coon Devisser; Owens-Corning Fiberglas; Hollinger &  
Co.; Bay City Hardware; Jennison Hardware

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and	
block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
85% Mag pipecovering, block	
and cement	Keasbey & Mattison/Turner & Newall
85% Mag pipecovering, block	
and cements	Mundet Cork (Crown Cork & Seal)
Thermobestos pipecovering and	
block	Johns-Manville
352 cement	Johns-Manville
Careytemp pipecovering and	
block	Philip Carey (Celotex/Rapid- American)

(\*) Denotes Plaintiff in an asbestos lawsuit.

7M-90 cement  
(Celotex/Rapid-

Philip

American)

Asbestos block insulation M.H.

Insulating cement

Products:

Detrick

M.H. Detrick

Manufacturers:

Stic-tite cement

Insulating cement

Insulating cements

Refractories)

Joint compounds

Joint compounds

Zonolite insulation

Combustion Engineering

A.P. Green

GREFCO

(General

U.S. Gypsum

Gold Bond (National Gypsum)

W.R. Grace

\*Duane Vizina, Box 4, Afton, MI 49705 (616) 238-9616

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Coon Devisser; Owens-Corning Fiberglas; Hollinger &  
Co.; Bay City Hardware; Jennison Hardware

Products:

Manufacturers:

Kaylo pipecovering and block  
Calsilite pipecovering and

block

7M cement

85% Mag pipecovering, block  
and cement

85% Mag pipecovering, block  
and cements

Thermobestos pipecovering and  
block

352 cement

Careytemp pipecovering and  
block

7M-90 cement  
(Celotex/Rapid-

Joint compounds

Joint compounds

Zonolite insulation

Owens-Corning Fiberglas

Ruberoid (GAF)

Ruberoid (GAF)

Keasbey & Mattison/Turner &  
Newall

Mundet Cork (Crown Cork &  
Seal)

Johns-Manville

Johns-Manville

Philip Carey (Celotex/Rapid-  
American)

Philip

Carey

American)

U.S. Gypsum

Gold Bond (National Gypsum)

W.R. Grace

(\*) Denotes Plaintiff in an asbestos lawsuit.



\*Pat Kelley, 3292 Ponemah Dr., Fenton, MI 48430 (313)

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Coon Devisser; Owens-Corning Fiberglas

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Asbestos block insulation	M.H. Detrick
Insulating cement	M.H. Detrick
Stic-tite cement	Combustion Engineering
Insulating cement	A.P. Green
Insulating cements	GREFCO (General
Refractories)	
Insulating cement	Grant Wilson
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Zonolite insulation	W.R. Grace

\*Jim Noykos, Box 393, Beaverton, 48612 MI (517) 435-9974

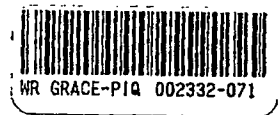
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Coon Devisser; Owens-Corning Fiberglas; Bay City  
Hardware; Jennison Hardware; Duro Supply

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and	
block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
85% Mag pipecovering, block	
and cement	Keasbey & Mattison/Turner & Newall
Careytemp pipecovering and	
block	Philip Carey (Celotex/Rapid-American)
7M-90 cement	Philip Carey
(Celotex/Rapid-	
Insulating cement	American)
Insulating cements	A.P. Green
Refractories)	GREFCO (General
Asbestos refractory cement	Rutland Fireclay
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Zonolite insulation	W.R. Grace

(\*) Denotes Plaintiff in an asbestos lawsuit.



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(\*) Denotes Plaintiff in an asbestos lawsuit.

\*Ronald Holcomb, 2547 Shaffer Road, Midland, MI  
689-  
3555



CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Coon Devisser; Owens-Corning Fiberglas; Hollinger &  
Co.; Bay City Hardware; Jennison Hardware

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and	
block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
Thermobestos pipecovering and	
block	Johns-Manville
352 cement	Johns-Manville
Stic-tite cement	Combustion Engineering
Insulating cement	A.P. Green
Insulating cements	GREFCO (General
Refractories)	
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Zonolite insulation	W.R. Grace

\*Derwin Finney, 2430 S. Five Mile Road, Midland, MI 48640

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Coon Devisser; Owens-Corning Fiberglas; Hollinger &  
Co.; Bay City Hardware; Jennison Hardware

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and	
block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
Thermobestos pipecovering and	
block	Johns-Manville
352 cement	Johns-Manville
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Zonolite insulation	W.R. Grace

(\*) Denotes Plaintiff in an asbestos lawsuit.

\*Robert Mason, 6725 Marion Street, Palm Point,  
33533 (813) 697-0056



CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Coon Devisser; Owens-Corning Fiberglas

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Asbestos block insulation	M.H. Detrick
Insulating cement	M.H. Detrick
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Zonolite insulation	W.R. Grace

\*Frank Egan, 1955 Mack Rd., Saginaw, MI 48601 (517) 755-2003

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Coon Devisser; Owens-Corning Fiberglas

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Asbestos block insulation	M.H. Detrick
Insulating cement	M.H. Detrick
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Zonolite insulation	W.R. Grace

Donald Krenz, 9860 Woodland Drive, Box 194, Bayport, MI 48720

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Coon Devisser; Owens-Corning Fiberglas

Products:

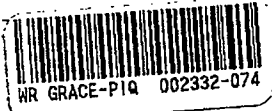
Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Asbestos block insulation	M.H. Detrick
Insulating cement	M.H. Detrick
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Zonolite insulation	W.R. Grace

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(\*) Denotes Plaintiff in an asbestos lawsuit.

\*Ronald Hebert, 806 West Borton Road, Essexville  
(517)  
893-9227



CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Coon Devisser; Owens-Corning Fiberglas; Hollinger &  
Co.; Bay City Hardware; Jennison Hardware

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and	
block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
Thermobestos pipecovering and	
block	Johns-Manville
352 cement	Johns-Manville
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Zonolite insulation	W.R. Grace

Donald Schultz, 21 Valentine Ct., Saginaw, MI 48603 (517)  
792-4228

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and	
block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
85% Mag pipecovering, block	
and cement	Keasbey & Mattison/Turner & Newall
85% Mag pipecovering, block	
and cements	Mundet Cork (Crown Cork & Seal)
Thermobestos pipecovering and	
block	Johns-Manville
352 cement	Johns-Manville
7M-90 cement	Philip
(Celotex/Rapid-	Carey
	American)
Asbestos block insulation	M.H. Detrick
Insulating cement	M.H. Detrick
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Zonolite insulation	W.R. Grace

(\*) Denotes Plaintiff in an asbestos lawsuit.

\*Roy Cherry, 836 South Boutell, Essexville, MI 4872326



Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
85% Mag pipecovering, block and cement	Keasbey & Mattison/Turner & Newall
85% Mag pipecovering, block and cements	Mundet Cork (Crown Cork & Seal)
Thermobestos pipecovering and block	Johns-Manville
352 cement	Johns-Manville
7M-90 cement	Philip Carey
(Celotex/Rapid-	American)
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Zonolite insulation	W.R. Grace

\*James M. Kelly, 447 South Lincoln, Bay City, MI 48708 (517) 893-7088

Products:

Manufacturers:

Kaylo pipecovering	Owens-Corning Fiberglas
Kilnoise accoustical plaster	Basic Inc.
Kilnoise accoustical plaster	Pfizer
Accoustical plaster	U.S. Gypsum
Accoustical plaster	Gold Bond (National Gypsum)

\*Edwin Bigelow, 3970 East Britton Road, Bancroft, MI 48414 (517) 634-9097

Products:

Manufacturers:

Kaylo pipecovering	Owens-Corning Fiberglas
Kilnoise accoustical plaster	Basic Inc.
Kilnoise accoustical plaster	Pfizer
Accoustical plaster	U.S. Gypsum
Accoustical plaster	Gold Bond (National Gypsum)

\*Roger R. Richard, 5224 Riverview Drive, Bridgeport, MI 48722 517-777-3093

Products:

Manufacturers:

Kaylo pipecovering	Owens-Corning Fiberglas
Kilnoise accoustical plaster	Basic Inc.
Kilnoise accoustical plaster	Pfizer

(\*) Denotes Plaintiff in an asbestos lawsuit.



Accoustical plaster  
Accoustical plaster

U.S. Gypsum  
Gold Bond (Na



\*Clarence Richard, 1376 North Center, Saginaw, MI 58603 (517)  
792-7820

Products:

Manufacturers:

Kaylo pipecovering  
Kilnoise accoustical plaster  
Kilnoise accoustical plaster  
Accoustical plaster  
Accoustical plaster

Owens-Corning Fiberglas  
Basic Inc.  
Pfizer  
U.S. Gypsum  
Gold Bond (National Gypsum)

Blaine LaVigne, 745 Campbell, Flint, MI

Products:

Manufacturers:

Kaylo pipecovering  
Kilnoise accoustical plaster  
Kilnoise accoustical plaster  
Accoustical plaster  
Accoustical plaster

Owens-Corning Fiberglas  
Basic Inc.  
Pfizer  
U.S. Gypsum  
Gold Bond (National Gypsum)

Hubert Cushman, 4376 South Belsay Road, Flint, MI

Products:

Manufacturers:

Kaylo pipecovering  
Kilnoise accoustical plaster  
Kilnoise accoustical plaster  
Accoustical plaster  
Accoustical plaster

Owens-Corning Fiberglas  
Basic Inc.  
Pfizer  
U.S. Gypsum  
Gold Bond (National Gypsum)

\*Charles W. Apsey, 4826 Leaside Drive, Saginaw, MI 48603 (517)  
792-5227

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Coon Devisser; Owens-Corning Fiberglas; Bay City  
Hardware; Jennison Hardware; Harrison Piping; Asbestos  
Specialties (Hi-Temp Products); Duro Supply

Products:

Manufacturers:

Kaylo pipecovering and block  
Asbestos block insulation M.H.  
Insulating cement  
Stic-tite cement  
Insulating cement  
Insulating cements  
Refractories)

Owens-Corning Fiberglas  
Detrick  
M.H. Detrick  
Combustion Engineering  
A.P. Green  
GREFCO (General

(\*) Denotes Plaintiff in an asbestos lawsuit.



Insulating cement  
Asbestos refractory cement  
Joint compounds  
Joint compounds  
Products:

Grant Wilson  
Rutland Fireclay  
U.S. Gypsum  
Gold Bond (National Gypsum)  
Manufacturers:

Asbestos containing gaskets  
and packing  
Asbestos containing gaskets  
and packing  
Asbestos containing gaskets  
and packing  
Asbestos containing gaskets  
and packing  
Zonolite insulation

Garlock  
Anchor Packing  
Palmetto (Green Tweed)  
Durabla  
W.R. Grace

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JOB NUMBER: 4  
 PERIOD WORKED: Mid 1960s  
 JOB SITE AND LOCATION: Western Michigan University, Kalamazoo, Michigan  
 EMPLOYER: John B. Rossi Co.  
 LENGTH OF EXPOSURE: 4-6 months

Plaintiff's investigation to date has identified the following products as having been used significantly on this job:

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
 FURNACES: Owens-Corning Fiberglas; Kalamazoo Asbestos; Bond  
 Supply; Galloup Pipe & Supply

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas	
Calsilite pipecovering and		
block	Ruberoid (GAF)	
7M cement	Ruberoid (GAF)	
Super 66 cement	Eagle Picher	
Monoblock, Super Powerhouse		
and No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)	
Thermobestos pipecovering and		
block	Johns-Manville	
352 cement	Johns-Manville	
7M-90 cement	Philip	Carey
(Celotex/Rapid-		
	American)	
Joint compounds	U.S. Gypsum	
Joint compounds	National Gypsum	
Zonolite insulation	W.R. Grace	

Initial contacts with witnesses leads Plaintiff to believe that the following witnesses will be able to identify at least the following products. Further, it is anticipated that the following witnesses will also testify relative to the presence of distributors/contractors and/or jobbers as identified above although, unless noted, the witnesses have not been interviewed regarding distributors/jobbers and/or contractors:

**REDACTED**

Will confirm exposures to those above identified asbestos-containing products.

(\*) Denotes Plaintiff in an asbestos lawsuit.

\*Ward A. Apple, 7059 West Harrison Road, Almd  
517-463-1948

Products:Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
7M-90 cement	Philip Carey
(Celotex/Rapid-	American)
Joint compounds	U.S. Gypsum
Joint compounds	National Gypsum
Zonolite insulation	W.R. Grace

\*Luther E. Hilliard, 317 Berry Avenue, Lansing, MI 48910  
517-882-7685

Products:Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
7M-90 cement	Philip Carey
(Celotex/Rapid-	American)
Joint compounds	U.S. Gypsum
Joint compounds	National Gypsum
Zonolite insulation	W.R. Grace

\*William Barker, 14661 Barton Lake Drive, Vicksburg, MI 49097  
(616) 649-0318

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Owens-Corning Fiberglas; Kalamazoo Asbestos; Bond  
Supply; Galloup Pipe & Supply

Products:Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and	
block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
Super 66 cement	Eagle Picher
Monoblock, Super Powerhouse	
and No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)
Thermobestos pipecovering and	
block	Johns-Manville
352 cement	Johns-Manville
7M-90 cement	Philip Carey
(Celotex/Rapid-	American)
Joint compounds	U.S. Gypsum
Joint compounds	National Gypsum

(\*) Denotes Plaintiff in an asbestos lawsuit.

Zonolite insulation

W.R. Grace



Doug Matteson, 524 Prosperity Dr., Portage, MI 496

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
 FURNACES: Owens-Corning Fiberglas; Kalamazoo Asbestos; Bond  
 Supply; Galloup Pipe & Supply

Products:Manufacturers:

Kaylo pipecovering and block Owens-Corning Fiberglas  
 Calsilite pipecovering and

block

Ruberoid (GAF)

7M cement

Ruberoid (GAF)

Super 66 cement

Eagle Picher

Monoblock, Super Powerhouse

and No. 1 Plus cement

Baldwin-Ehret-Hill (Keene)

Thermobestos pipecovering and

block

Johns-Manville

352 cement

Johns-Manville

7M-90 cement

Philip

Carey

(Celotex/Rapid-

American)

Joint compounds

U.S. Gypsum

Joint compounds

National Gypsum

Zonolite insulation

W.R. Grace

Chris Koets, 1213 Jenks Blvd., Kalamazoo, MI 49007

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
 FURNACES: Owens-Corning Fiberglas; Kalamazoo Asbestos; Bond  
 Supply; Galloup Pipe & Supply

Products:Manufacturers:

Kaylo pipecovering and block Owens-Corning Fiberglas  
 Calsilite pipecovering and

block

Ruberoid (GAF)

7M cement

Ruberoid (GAF)

Super 66 cement

Eagle Picher

Monoblock, Super Powerhouse

and No. 1 Plus cement

Baldwin-Ehret-Hill (Keene)

Thermobestos pipecovering and

block

Johns-Manville

352 cement

Johns-Manville

7M-90 cement

Philip

Carey

(Celotex/Rapid-

American)

Joint compounds

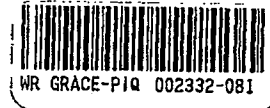
U.S. Gypsum

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 (\*) Denotes Plaintiff in an asbestos lawsuit.

Joint compounds  
Zonolite insulation

National Gypsum  
W.R. Grace



\*Edward Ruell, 4932 Lawrence Road, Route 3, Nashville, MI 49073  
(517) 852-9821

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Owens-Corning Fiberglas; Kalamazoo Asbestos; Bond  
Supply; Galloup Pipe & Supply

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas	
Calsilite pipecovering and		
block	Ruberoid (GAF)	
7M cement	Ruberoid (GAF)	
Super 66 cement	Eagle Picher	
Monoblock, Super Powerhouse		
and No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)	
Thermobestos pipecovering and		
block	Johns-Manville	
352 cement	Johns-Manville	
7M-90 cement	Philip	Carey
(Celotex/Rapid-		
	American)	
Joint compounds	U.S. Gypsum	
Joint compounds	National Gypsum	
Zonolite insulation	W.R. Grace	

\*Daniel Ruell, 3351 East Morristown Road, Lake City, MI 49651  
(616) 229-4223

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Owens-Corning Fiberglas; Kalamazoo Asbestos; Bond  
Supply; Galloup Pipe & Supply

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and	
block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
Super 66 cement	Eagle Picher
Monoblock, Super Powerhouse	
and No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)
Thermobestos pipecovering and	

(\*) Denotes Plaintiff in an asbestos lawsuit.



block  
352 cement  
7M-90 cement  
(Celotex/Rapid-

Johns-Manville  
Johns-Manville  
Philip

Carey

Products:

Joint compounds  
Joint compounds  
Zonolite insulation

Manufacturers:

U.S. Gypsum  
National Gypsum  
W.R. Grace

\*Wayne Terberg, 209 Meadows Dr., Augusta, MI (616) 731-4934

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Owens-Corning Fiberglas; Kalamazoo Asbestos; Bond  
Supply; Galloup Pipe & Supply

Products:

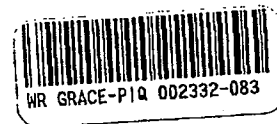
Manufacturers:

Kaylo pipecovering and block Owens-Corning Fiberglas  
Calsilite pipecovering and  
block Ruberoid (GAF)  
7M cement Ruberoid (GAF)  
Super 66 cement Eagle Picher  
Monoblock, Super Powerhouse  
and No. 1 Plus cement Baldwin-Ehret-Hill (Keene)  
Thermobestos pipecovering and  
block Johns-Manville  
352 cement Johns-Manville  
7M-90 cement Philip Carey  
(Celotex/Rapid-

Joint compounds  
Joint compounds  
Zonolite insulation

American)  
U.S. Gypsum  
National Gypsum  
W.R. Grace

(\*) Denotes Plaintiff in an asbestos lawsuit.



JOB NUMBER: 5  
 PERIOD WORKED: 1969 - 1970  
 JOB SITE AND LOCATION: Dow Chemical Plant, Midland, Michigan  
 EMPLOYER: John B. Rossi Co.  
 LENGTH OF EXPOSURE: 3 months

Plaintiff's investigation to date has identified the following products as having been used significantly on this job:

CONTRACTORS/DISTRIBUTORS/JOBBER'S PRESENT AT THE JOBSITE  
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
 FURNACES: Austin Company; Hollinger & Company; Jennison  
 Hardware; Alexander Stafford; Acme Insulations; Coon Devisser;  
 Industrial Insulations, Inc.; Harrison Piping; Bay City  
 Hardware; Asbestos Specialties (Hi-Temp Products); Duro Supply

Products:

Manufacturers:

Unibestos pipecovering	Pittsburgh Corning
Kaylo pipecovering and block	Owens Corning
Fiberglas	
Calsilite pipecovering and block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
Careytemp pipecovering and block	Philip Carey
(Celotex/Rapid American)	
7M-90 cement	Philip Carey (Celotex/Rapid
American)	
Caltemp pipecovering and block	Pabco (Fibreboard)
Monoblock	Baldwin-Ehret-Hill (Keene)
No. 1 Plus cement	Baldwin-Ehret-Hill
(Keene)	
Thermasil pipecovering and block	Baldwin-Ehret-
Hill (Keene)	
Thermobestos pipecovering and block	Johns-Manville
352 and 450 cements	Johns-Manville
Super 66 cement	Eagle Picher
Insulating cement	A.P. Green
Asbestos block insulation	Plibrico
Insulating cement	Plibrico
Insulating cement	GREFCO (General
Refractories)	
Insulating cement	North American
Refractories	
Stic-tite cement	Combustion Engineering
Refractory cement	Rutland Fireclay
Asbestos containing gaskets and packing	John Crane
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	A.W. Chesterton
Asbestos containing gaskets and packing	Durabla
Asbestos containing gaskets	Flexitallic

(\*) Denotes Plaintiff in an asbestos lawsuit.



Products:

Oakum 310 and 310A  
 Zonolite Insulation  
 Asbestos wrapped/lined boilers  
 Asbestos wrapped/lined boilers  
 Asbestos wrapped/lined boilers  
 Asbestos wrapped/lined turbines  
 and generators

Manufacturers:

Sealite  
 W.R. Grace  
 Riley Stoker  
 Babcock & Wilcox  
 Combustion Engineering  
 General Electric



Initial contacts with witnesses leads Plaintiff to believe that the following witnesses will be able to identify at least the following products. Further, it is anticipated that the following distributors/contractors and/or jobbers as identified above although, unless noted, the witnesses have not been interviewed regarding distributors/jobbers and/or contractors:

**REDACTED**

Will confirm exposures to those above identified asbestos-containing products.

\*Thomas E. Garlick, 43705 Harris, Belleville, MI 48111 (313) 697-7879

Products:

Unibestos pipecovering  
 Kaylo pipecovering and block  
 Fiberglas  
 Asbestos wrapped/lined boilers  
 Asbestos wrapped/lined boilers  
 Asbestos wrapped/lined boilers  
 Asbestos wrapped/lined turbines  
 and generators

Manufacturers:

Pittsburgh Corning  
 Owens Corning  
 Riley Stoker  
 Babcock & Wilcox  
 Combustion Engineering  
 General Electric

\*Gary D. Aldrich, 407 West Jenny, Bay City, MI 48706 (517) 894-7921

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
 FURNACES: Austin Company; Hollinger & Company; Jennison  
 Hardware; Acme Insulations; Industrial Insulations, Inc.;  
 Harrison Piping; Asbestos Specialties (Hi-Temp Products); Duro  
 Supply

Products:

Unibestos pipecovering  
 Kaylo pipecovering and block  
 Fiberglas  
 Careytemp pipecovering and block

Manufacturers:

Pittsburgh Corning  
 Owens Corning  
 Philip Carey

(\*) Denotes Plaintiff in an asbestos lawsuit.

(Celotex/Rapid American)  
Products:

Manufacturers:



7M-90 cement  
 American)  
 Thermobestos pipecovering and block Johns-Manville  
 352 and 450 cements Johns-Manville  
 Asbestos containing gaskets and packing Anchor Packing  
 Asbestos wrapped/lined boilers Riley Stoker

Philip Carey (Celotex/Rapid

\*Dean A. Kinsella, 984 Schust Road, Saginaw, MI 48604 (517)  
 744-6908

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
 FURNACES: Austin Company

Products:

Manufacturers:

Unibestos pipecovering  
 Kaylo pipecovering and block  
 Fiberglas  
 7M-90 cement  
 American)  
 Asbestos wrapped/lined boilers  
 Asbestos wrapped/lined turbines  
 and generators

Pittsburgh Corning  
 Owens Corning

Philip Carey (Celotex/Rapid

Riley Stoker

General Electric

\*James R. Seaver, 8955 Carter Road, Freeland, MI 48623 (517)  
 695-9513

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
 FURNACES: Austin Company; Hollinger & Company; Coon Devisser;  
 Industrial Insulations, Inc.

Products:

Manufacturers:

Unibestos pipecovering  
 Kaylo pipecovering and block  
 Fiberglas  
 Calsilite pipecovering and block  
 7M cement  
 Careytemp pipecovering and block  
 (Celotex/Rapid American)  
 7M-90 cement  
 American)  
 Thermobestos pipecovering and block Johns-Manville  
 352 and 450 cements Johns-Manville  
 Zonolite Insulation W.R. Grace

Pittsburgh Corning  
 Owens Corning

Ruberoid (GAF)

Ruberoid (GAF)

Philip Carey

Philip Carey (Celotex/Rapid

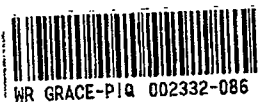
(\*) Denotes Plaintiff in an asbestos lawsuit.

Products:

Asbestos wrapped/lined boilers  
Asbestos wrapped/lined boilers  
Asbestos wrapped/lined boilers  
Asbestos wrapped/lined turbines  
and generators

Manufacturers:

Riley Stok  
Babcock & Wilcox  
Combustion Engineering  
General Electric



\*James W. Calkins, 1004 James Street, Harrison, MI 48625  
(517) 539-2243

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Austin Company

Products:

Kaylo pipecovering and block  
Fiberglas  
7M-90 cement  
American)  
Insulating cement  
Asbestos block insulation  
Insulating cement  
Insulating cement  
Refractories)

Manufacturers:

Owens Corning.  
Philip Carey (Celotex/Rapid  
A.P. Green  
Plibrico  
Plibrico  
GREFCO (General

Insulating cement  
Refractories  
Stic-tite cement  
Refractory cement  
Zonolite Insulation

North American  
Combustion Engineering  
Rutland Fireclay  
W.R. Grace

\*Robert J. Beach, 552 South Eleven Mile, Midland, MI 48640

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Austin Company

Products:

Unibestos pipecovering  
Kaylo pipecovering and block  
Fiberglas  
7M-90 cement  
American)  
Insulating cement  
Asbestos block insulation  
Insulating cement

Manufacturers:

Pittsburgh Corning  
Owens Corning  
Philip Carey (Celotex/Rapid  
A.P. Green  
Plibrico  
Plibrico

Products:

Manufacturers:

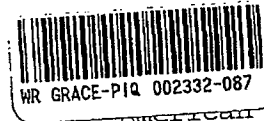
(\*) Denotes Plaintiff in an asbestos lawsuit.

Insulating cement  
Refractories)  
Insulating cement  
Refractories  
Stic-tite cement  
Refractory cement  
Zonolite Insulation

GREFCO

North

Combustion Engineering  
Rutland Fireclay  
W.R. Grace



\*Richard C. Hull, 4779 Joy Road, Midland, MI 48642 (517) 496-3243

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Austin Company

Products:

Unibestos pipecovering  
Kaylo pipecovering and block  
Fiberglas  
7M-90 cement  
American)  
Insulating cement  
Asbestos block insulation  
Insulating cement  
Insulating cement  
Refractories)  
Insulating cement  
Refractories  
Stic-tite cement  
Refractory cement  
Zonolite Insulation

Manufacturers:

Pittsburgh Corning  
Owens Corning  
Philip Carey (Celotex/Rapid  
A.P. Green  
Plibrico  
Plibrico  
GREFCO (General  
North American  
Combustion Engineering  
Rutland Fireclay  
W.R. Grace

\*William R. Glass, P.O. Box 2211, Port Charlotte, FL 33949  
(813) 627-4363

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Austin Company; Hollinger & Company; Jennison  
Hardware; Industrial Insulations, Inc.; Bay City Hardware

Products:

Unibestos pipecovering  
Kaylo pipecovering and block  
Fiberglas  
Calsilite pipecovering and block  
7M cement

Manufacturers:

Pittsburgh Corning  
Owens Corning  
Ruberoid (GAF)  
Ruberoid (GAF)  
Manufacturers:

Products:

(\*) Denotes Plaintiff in an asbestos lawsuit.

Careytemp pipecovering and block  
(Celotex/Rapid American)  
7M-90 cement

Philip



Philip Carey (Celotex/Rapid American)

American)  
Thermobestos pipecovering and block  
352 and 450 cements  
Super 66 cement  
Zonolite Insulation  
Asbestos wrapped/lined boilers

Johns-Manville  
Johns-Manville

Eagle Picher  
W.R. Grace  
Riley Stoker

\*Henry Boyer, 9539 South Harrison Avenue, Farwell, MI 48622  
(517) 386-9782

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Austin Company; Jennison Hardware; Harrison Piping;  
Bay City Hardware; Asbestos Specialties (Hi-Temp Products);  
Duro Supply

Products:

Manufacturers:

Unibestos pipecovering  
Kaylo pipecovering and block  
Fiberglas  
Asbestos pipecovering, block  
and cement  
Insulating cement  
Asbestos containing gaskets and packing  
Asbestos containing gaskets  
Zonolite Insulation  
Asbestos wrapped/lined boilers  
Asbestos wrapped/lined boilers  
Asbestos wrapped/lined boilers

Pittsburgh Corning  
Owens Corning  
Johns-Manville  
A.P. Green  
Garlock  
Flexitallic  
W.R. Grace  
Riley Stoker  
Babcock & Wilcox  
Combustion Engineering

(\*) Denotes Plaintiff in an asbestos lawsuit.



\*Timoroy Hazen, 1318 Bookness, Midland, MI 48640 (517)

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
 FURNACES: Austin Company; Jennison Hardware; Harrison Piping;  
 Bay City Hardware; Asbestos Specialties (Hi-Temp Products);  
 Duro Supply

Products:

Manufacturers:

Kaylo pipecovering and block	Owens	Corning
Fiberglas		
Asbestos pipecovering, block		Johns-Manville
and cements		
Asbestos containing gaskets and packing		Anchor Packing
Asbestos containing gaskets and packing		Garlock
Asbestos containing gaskets and packing		A.W. Chesterton

\*Carlos Espitia, Jr., 1606 Borton Avenue, Essexville, MI 48732  
 (517) 893-4150

Products:

Manufacturers:

Unibestos pipecovering	Pittsburgh Corning
Kaylo pipecovering and block	Owens Corning
Fiberglas	
Insulating cement	A.P. Green
Insulating cement	GREFCO (General
Refractories)	
Insulating cement	North American
Refractories	
Stic-tite cement	Combustion Engineering
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets	Flexitallic
Zonolite Insulation	W.R. Grace
Asbestos wrapped/lined boilers	Riley Stoker
Asbestos wrapped/lined boilers	Babcock & Wilcox
Asbestos wrapped/lined boilers	Combustion Engineering

(\*) Denotes Plaintiff in an asbestos lawsuit..

\*William Pippo, 1479 Midland Road, Saginaw, MI  
793-8386



CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Coon Devisser; Harrison Piping; Duro Supply

Products:

Manufacturers:

Kaylo pipecovering and block	Owens	Corning
Fiberglas		
Insulating cement	A.P. Green	
Asbestos containing gaskets and packing	John Crane	
Asbestos containing gaskets and packing	Anchor Packing	
Asbestos containing gaskets and packing	Garlock	
Asbestos containing gaskets and packing	A.W. Chesterton	
Asbestos containing gaskets and packing	Durabla	
Asbestos containing gaskets	Flexitallic	
Oakum 310 and 310A	Sealite	
Zonolite Insulation	W.R. Grace	
Asbestos wrapped/lined boilers	Riley Stoker	
Asbestos wrapped/lined boilers	Babcock & Wilcox	
Asbestos wrapped/lined boilers	Combustion Engineering	

\*Paul Nimphie, P.O. Box 54, Sterling, MI 48659 (517) 654-2295

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Austin Company; Jennison Hardware; Coon Devisser;  
Harrison Piping; Bay City Hardware; Duro Supply

Products:

Manufacturers:

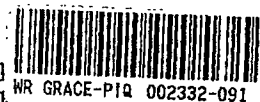
Kaylo pipecovering and block	Owens	Corning
Fiberglas		
Calsilite pipecovering and block	Ruberoid (GAF)	
7M cement	Ruberoid (GAF)	
Careytemp pipecovering and block	Philip	Carey
(Celotex/Rapid American)		
7M-90 cement	Philip Carey (Celotex/Rapid	
American)		
Caltemp pipecovering and block	Pabco (Fibreboard)	
Thermobestos pipecovering and block	Johns-Manville	
352 and 450 cements	Johns-Manville	
Insulating cement	A.P. Green	
Refractory cement	Rutland Fireclay	
Asbestos containing gaskets and packing	John Crane	

Products:

Manufacturers:

Asbestos containing gaskets and packing Anchor Packing

(\*) Denotes Plaintiff in an asbestos lawsuit.



Asbestos containing gaskets and packing Garlock  
 Asbestos containing gaskets and packing A.W. Chesterton  
 Asbestos containing gaskets Flexitallic  
 Oakum 310 and 310A Sealite  
 Zonolite Insulation W.R. Grace  
 Asbestos wrapped/lined boilers Riley Stoker

\*George Such, 3212 Lowell, Saginaw, MI 48601 (517) 753-3056

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
 FURNACES: Austin Company; Harrison Piping; Asbestos Specialties  
 (Hi-Temp Products); Duro Supply

Products:

Manufacturers:

Kaylo pipecovering and block	Owens	Corning
Fiberglas		
Calsilite pipecovering and block	Ruberoid (GAF)	
7M cement	Ruberoid (GAF)	
7M-90 cement	Philip Carey (Celotex/Rapid	
American)		
Asbestos containing gaskets and packing	John Crane	
Asbestos containing gaskets and packing	Anchor Packing	
Asbestos containing gaskets and packing	Garlock	
Asbestos containing gaskets and packing	A.W. Chesterton	
Asbestos containing gaskets	Flexitallic	

\*Harry Heitman, 705 Burns Street, Essexville, MI 48732 (517)  
 893-2272

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
 FURNACES: Austin Company; Harrison Piping; Asbestos Specialties  
 (Hi-Temp Products); Duro Supply

Products:

Manufacturers:

Kaylo pipecovering and block	Owens	Corning
Fiberglas		
Calsilite pipecovering and block	Ruberoid (GAF)	
7M-90 cement	Philip Carey (Celotex/Rapid	
American)		

Products:

Manufacturers:

Super 66 cement	Eagle Picher
Asbestos containing gaskets and packing	John Crane
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	A.W. Chesterton

(\*) Denotes Plaintiff in an asbestos lawsuit.



Asbestos containing gaskets

Flexi:



\*James George, 530 E. Washington, Freeland, MI  
695-9216

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Austin Company; Harrison Piping; Asbestos Specialties  
(Hi-Temp Products); Duro Supply

Products:Manufacturers:

Kaylo pipecovering and block	Owens	Corning
Fiberglas		
Calsilite pipecovering and block		Ruberoid (GAF)
7M-90 cement	Philip Carey (Celotex/Rapid	
American)		
Super 66 cement	Eagle Picher	
Asbestos containing gaskets and packing	John Crane	
Asbestos containing gaskets and packing	Anchor Packing	
Asbestos containing gaskets and packing	Garlock	
Asbestos containing gaskets and packing	A.W. Chesterton	
Asbestos containing gaskets	Flexitallic	

\*Henry Wardwell, 1632 S. Leaton Road, Mt. Pleasant, MI 48858  
(517) 773-3163

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Austin Company; Harrison Piping; Asbestos Specialties  
(Hi-Temp Products); Duro Supply

Products:Manufacturers:

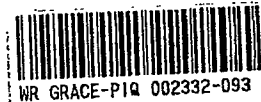
Kaylo pipecovering and block	Owens	Corning
Fiberglas		
Calsilite pipecovering and block		Ruberoid (GAF)
7M-90 cement	Philip Carey (Celotex/Rapid	
American)		

Products:Manufacturers:

Super 66 cement	Eagle Picher
Asbestos containing gaskets and packing	John Crane
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	A.W. Chesterton
Asbestos containing gaskets	Flexitallic

\*Robert Salois, 5439 Baxman Rd., Bay City, MI 48706 (517) 786-

(\*) Denotes Plaintiff in an asbestos lawsuit.



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CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Alexander Stafford; Austin Co.; Hollinger & Co.; Acme  
Insulations; Coon Devisser; Industrial Insulations, Inc.

<u>Products:</u>	<u>Manufacturers:</u>
Unibestos pipecovering	Pittsburgh Corning
Kaylo pipecovering and block	Owens Corning
Fiberglas	
Calsilite pipecovering and block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
Careytemp pipecovering and block	Philip Carey
(Celotex/Rapid American)	
7M-90 cement	Philip Carey (Celotex/Rapid
American)	
Caltemp pipecovering and block	Pabco (Fibreboard)
Monoblock	Baldwin-Ehret-Hill (Keene)
No. 1 Plus cement	Baldwin-Ehret-Hill
(Keene)	
Thermasil pipecovering and block	Baldwin-Ehret-
Hill (Keene)	
Thermobestos pipecovering and block	Johns-Manville
352 and 450 cements	Johns-Manville
Super 66 cement	Eagle Picher
Zonolite Insulation	W.R. Grace
Asbestos wrapped/lined boilers	Riley Stoker

William Dvorak, 3374 Winter St., Saginaw, MI 48604 (517) 754-6357

<u>Products:</u>	<u>Manufacturers:</u>
Unibestos pipecovering	Pittsburgh Corning
Kaylo pipecovering and block	Owens Corning
Fiberglas	
Calsilite pipecovering and block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
Careytemp pipecovering and block	Philip Carey
(Celotex/Rapid American)	
7M-90 cement	Philip Carey (Celotex/Rapid
American)	
Caltemp pipecovering and block	Pabco (Fibreboard)
<u>Products:</u>	<u>Manufacturers:</u>
Monoblock	Baldwin-Ehret-Hill (Keene)
No. 1 Plus cement	Baldwin-Ehret-Hill
(Keene)	
Thermasil pipecovering and block	Baldwin-Ehret-
Hill (Keene)	
Thermobestos pipecovering and block	Johns-Manville

(\*) Denotes Plaintiff in an asbestos lawsuit.

352 and 450 cements  
 Super 66 cement  
 Asbestos wrapped/lined boilers

Johns-Manville  
 Eagle Picher  
 Riley Stoker



\*Max Bowman, 4675 Orchard Manor, Apt. #6, Bay City, MI 48706  
 (517) 684-5737

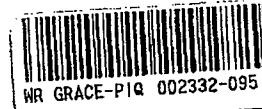
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
 FURNACES: Hollinger & Company; Acme Insulations; Coon Devisser;  
 Industrial Insulations, Inc.

Products:

Manufacturers:

Unibestos pipecovering	Pittsburgh Corning
Kaylo pipecovering and block	Owens Corning
Fiberglas	
Calsilite pipecovering and block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
Careytemp pipecovering and block	Philip Carey
(Celotex/Rapid American)	
7M-90 cement	Philip Carey (Celotex/Rapid
American)	
Caltemp pipecovering and block	Pabco (Fibreboard)
Monoblock	Baldwin-Ehret-Hill (Keene)
No. 1 Plus cement	Baldwin-Ehret-Hill
(Keene)	
Thermasil pipecovering and block	Baldwin-Ehret-
Hill (Keene)	
Thermobestos pipecovering and block	Johns-Manville
352 and 450 cements	Johns-Manville
Super 66 cement	Eagle Picher
Asbestos wrapped/lined boilers	Riley Stoker
Asbestos wrapped/lined boilers	Babcock & Wilcox
Asbestos wrapped/lined boilers	Combustion Engineering

(\*) Denotes Plaintiff in an asbestos lawsuit.



\*Michael Willman, 7210 Deborah Drive, Saginaw, MI 48603  
(517) 781-3775

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Hollinger & Company; Acme Insulations; Coon Devisser;  
Industrial Insulations, Inc.

Products:

Manufacturers:

Unibestos pipecovering	Pittsburgh Corning
Kaylo pipecovering and block	Owens Corning
Fiberglas	
Calsilite pipecovering and block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
Careytemp pipecovering and block	Philip Carey
(Celotex/Rapid American)	
7M-90 cement	Philip Carey (Celotex/Rapid
American)	
Monoblock	Baldwin-Ehret-Hill (Keene)
No. 1 Plus cement	Baldwin-Ehret-Hill
(Keene)	
Thermasil pipecovering and block	Baldwin-Ehret-
Hill (Keene)	
Thermobestos pipecovering and block	Johns-Manville
352 and 450 cements	Johns-Manville
Super 66 cement	Eagle Picher
Asbestos wrapped/lined boilers	Babcock & Wilcox
Asbestos wrapped/lined boilers	Combustion Engineering

\*John Wagar, 707 Warner, Bay City, MI 48706 (517) 895-5738

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Hollinger & Company; Acme Insulations; Coon Devisser;  
Industrial Insulations, Inc.

Products:

Manufacturers:

Unibestos pipecovering	Pittsburgh Corning
Kaylo pipecovering and block	Owens Corning
Fiberglas	
Calsilite pipecovering and block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
Careytemp pipecovering and block	Philip Carey
(Celotex/Rapid American)	
7M-90 cement	Philip Carey (Celotex/Rapid
American)	
Caltemp pipecovering and block	Pabco (Fibreboard)
Monoblock	Baldwin-Ehret-Hill (Keene)
No. 1 Plus cement	Baldwin-Ehret-Hill
(Keene)	

(\*) Denotes Plaintiff in an asbestos lawsuit.



Thermasil pipecovering and block Baldwin-Ehret-Hill (Keene)  
 Thermobestos pipecovering and block Johns-Manville  
Products: Manufacturers:  
 352 and 450 cements Johns-Manville  
 Super 66 cement Eagle Picher  
 Zonolite Insulation W.R. Grace

\*Jerome Dasky, 564 W. Salzburg Road, Auburn, MI 48611 (517)  
 662-6908

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
 FURNACES: Hollinger & Company

Products: Manufacturers:  
 Unibestos pipecovering Pittsburgh Corning  
 Kaylo pipecovering and block Owens Corning  
 Fiberglas  
 Calsilite pipecovering and block Ruberoid (GAF)  
 Careytemp pipecovering and block Philip Carey  
 (Celotex/Rapid American)  
 7M-90 cement Philip Carey (Celotex/Rapid  
 American)  
 Caltemp pipecovering and block Pabco (Fibreboard)  
 Monoblock Baldwin-Ehret-Hill (Keene)  
 No. 1 Plus cement Baldwin-Ehret-Hill  
 (Keene)  
 Thermasil pipecovering and block Baldwin-Ehret-Hill (Keene)  
 Thermobestos pipecovering and block Johns-Manville  
 352 and 450 cements Johns-Manville  
 Super 66 cement Eagle Picher  
 Asbestos wrapped/lined boilers Riley Stoker  
 Asbestos wrapped/lined boilers Babcock & Wilcox

\*James Noykos, Box 393, Beaverton, MI 48612

Products: Manufacturers:  
 Unibestos pipecovering Pittsburgh Corning  
 Kaylo pipecovering and block Owens Corning  
 Fiberglas  
 Calsilite pipecovering and block Ruberoid (GAF)  
 Careytemp pipecovering and block Philip Carey  
 (Celotex/Rapid American)  
 7M-90 cement Philip Carey (Celotex/Rapid  
 American)  
 Caltemp pipecovering and block Pabco (Fibreboard)  
 Monoblock Baldwin-Ehret-Hill (Keene)

(\*) Denotes Plaintiff in an asbestos lawsuit.

Baldwin-F



Baldwin-F

No. 1 Plus cement  
(Keene)  
Thermasil pipecovering and block  
Hill (Keene)

Thermobestos pipecovering and block Johns-Manville  
352 and 450 cements Johns-Manville  
Products:

Manufacturers:

Super 66 cement Eagle Picher  
Asbestos wrapped/lined boilers Riley Stoker  
Asbestos wrapped/lined boilers Babcock & Wilcox

---

(\*) Denotes Plaintiff in an asbestos lawsuit.



JOB NUMBER: 6  
 PERIOD WORKED: 1970  
 JOB SITE AND LOCATION: Palasades Nuclear Plant, South Haven,  
 Michigan  
 EMPLOYER: John B. Rossi Co.  
 LENGTH OF EXPOSURE: 3 months

Plaintiff's investigation to date has identified the following products as having been used significantly on this job:

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
 FURNACES: Acme Insulations; Alexander Stafford

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Unibestos pipecovering	Pittsburgh Corning
Super 66 cement	Eagle Picher
One Cote cement	Eagle Picher
No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)
352 cement	Johns-Manville
301 cement	Johns-Manville
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets and packing	Palmetto (Green Tweed)
Asbestos pipecovering, block and cement	Supplied by Acme Insulation

Initial contacts with witnesses leads Plaintiff to believe that the following witnesses will be able to identify at least the following products. Further, it is anticipated that the following witnesses will also testify relative to the presence of distributors/contractors and/or jobbers as identified above although, unless noted, the witnesses have not been interviewed regarding distributors/jobbers and/or contractors:

**REDACTED**

Will confirm exposures to those above identified asbestos-containing products.

(\*) Denotes Plaintiff in an asbestos lawsuit.

\*Earl E. Fulk, 8150 Independence, Cadillac  
616-779-1238



CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Acme Insulations; Alexander Stafford

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Unibestos pipecovering	Pittsburgh Corning
Super 66 cement	Eagle Picher
One Cote cement	Eagle Picher
No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)
352 cement	Johns-Manville
301 cement	Johns-Manville

\*Thomas E. Atkinson, 6283 Egypt Valley, Rockford, MI 49341  
616-874-6678

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Acme Insulations; Alexander Stafford

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Unibestos pipecovering	Pittsburgh Corning
Super 66 cement	Eagle Picher
One Cote cement	Eagle Picher
No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)
352 cement	Johns-Manville
301 cement	Johns-Manville

\*Harold W. Parker, 4922 Henry Steet, Muskegon, MI 49441  
616-798-2944

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets and packing	Palmetto (Green Tweed)

\*Salvatore Zarb, 9054 Arnold Ira, MI 48023

(\*) Denotes Plaintiff in an asbestos lawsuit.





Products:

Manufacturers:

Kaylo pipecovering and block Owens-Corning Fiberglas

\*Kenneth Stickney, 39934 County Road 390, Bloomingdale, MI 49026

Products:

Manufacturers:

Kaylo pipecovering and block Owens-Corning Fiberglas

\*Chester Boyd, 11589 U.S. 23 North, Alpena, MI 49707

Products:

Manufacturers:

Kaylo pipecovering and block Owens-Corning Fiberglas

\*Carl Henni, 9871 Citadel Lane South, Apt. 208, Bonita Springs, FL 33923

Products:

Manufacturers:

Kaylo pipecovering and block Owens-Corning Fiberglas

\*William Burns, 1410 Lonfellow, Jackson, MI 49202 (517) 782-3977

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Acme Insulations; Alexander Stafford

Products:

Manufacturers:

Kaylo pipecovering and block Owens-Corning Fiberglas  
Unibestos pipecovering Pittsburgh Corning

Super 66 cement

Eagle Picher

One Cote cement

Eagle Picher

352 cement

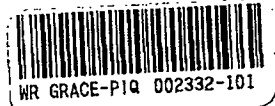
Johns-Manville

301 cement

Johns-Manville

(\*) Denotes Plaintiff in an asbestos lawsuit.

\*Pat Loftus, 15 Ashery Drive, Schoolcraft, MI 679-4537



CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
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MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Acme Insulations; Alexander Stafford

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Unibestos pipecovering	Pittsburgh Corning
Super 66 cement	Eagle Picher
One Cote cement	Eagle Picher
352 cement	Johns-Manville
301 cement	Johns-Manville

\*Louis Oravitz, 456 Ault St., Hemlock, MI 48626 (517) 642-5022

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
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MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Acme Insulations; Alexander Stafford

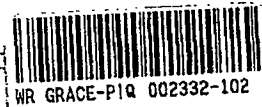
Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Unibestos pipecovering	Pittsburgh Corning
Super 66 cement	Eagle Picher
One Cote cement	Eagle Picher
352 cement	Johns-Manville
301 cement	Johns-Manville

(\*) Denotes Plaintiff in an asbestos lawsuit.

\*Robert Salois, 5439 Baxman Rd., Bay City, MI 786-0020



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MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Acme Insulations; Alexander Stafford

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Unibestos pipecovering	Pittsburgh Corning
Super 66 cement	Eagle Picher
One Cote cement	Eagle Picher
No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)
352 cement	Johns-Manville
301 cement	Johns-Manville
Asbestos pipecovering, block and cement	Supplied by Acme Insulation

\*Anthony Deboer, 1514 Winslow, N.W, Grand Rapids, MI 49504

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Acme Insulations; Alexander Stafford

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
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Daniel Salois, 303 Revilo, Bay City, MI 48706

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Acme Insulations; Alexander Stafford

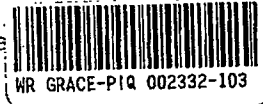
Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
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(\*) Denotes Plaintiff in an asbestos lawsuit.

\*Preston Sammons, 3540 4th Street North, St. Pe  
33704



CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION  
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Acme Insulations; Alexander Stafford

Products:

Manufacturers:

Kaylo pipecovering and block Owens-Corning Fiberglas

\*Robert Paull, 13463 128th Street, Grand Haven, MI 49417

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
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MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Acme Insulations; Alexander Stafford

Products:

Manufacturers:

Kaylo pipecovering and block Owens-Corning Fiberglas

\*Donald Simmons, 1690 West Lakewood Blvd., Holland, MI 49423

Products:

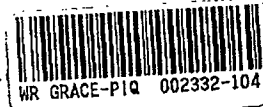
Manufacturers:

Kaylo pipecovering and block Owens-Corning Fiberglas

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(\*) Denotes Plaintiff in an asbestos lawsuit.

\*Roy McElvany, 370 Teal Drive, Coldwater, MI 4903



CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE  
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MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,  
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR  
FURNACES: Acme Insulations; Alexander Stafford

Products:

Manufacturers:

Kaylo pipecovering and block Owens-Corning Fiberglas

Respectfully submitted,

RUSSELL R. BEAUDOEN (P41185)  
Attorney for Plaintiffs  
280 N. Woodward, Ste. 406  
Birmingham, MI 48009  
(810) 647-6966

DATED: September 30, 2005

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(\*) Denotes Plaintiff in an asbestos lawsuit.



B2598

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ANATOMIC AND CLINICAL PATHOLOGY  
DIPLOMATE AMERICAN BOARD OF  
FORENSIC MEDICINE  
DIPLOMATE AMERICAN BOARD OF  
FORENSIC EXAMINERS

**JAYWANT P. PARMAR, MD, INC.**  
CONSULTATION IN PATHOLOGY



833 NATIONAL RD.  
SUITE 205  
WHEELING, WV 26003

PHONE 304-234-1899  
FAX 304-234-1849

September 10, 1997

Ms. Susan E. Jurik  
Legal/Medical Records Assistant  
Goldberg, Persky, Jennings & White, P.C.  
Plaza North  
4800 Fashion Square Boulevard, Suite 260  
Saginaw, MI 48604-2602

RE:

**REDACTED**

Dear Ms. Jurik:

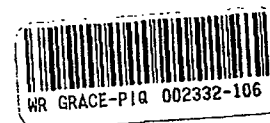
At your request, in a letter to me dated September 2, 1997, I have reviewed various medical records and pathology slides on the above-captioned plaintiff.

Medical records submitted consists of the following:

1. Your letter which includes an occupational history and a smoking history.
2. An ILO B Reader report by Doctor Ray Harron on a chest film dated February 1, 1994 and read by him on February 14, 1994.
3. Hospitalization records for a hospitalization to Pennock Hospital in Hastings, Michigan between May 10, 1994 and May 20, 1994. This hospitalization record includes a history and physical with discharge summary and a pulmonary function study with interpretation.
4. Various hospitalization records subsequent to May 1994, also at the Pennock Hospital in Hastings, Michigan during which time various additional biopsies were performed including a left colon resection for a colonic adenocarcinoma.

Pathology material submitted include the following:

1. A set of slides labeled 94S-847, six slides with the six corresponding blocks and the accompanying report dated May 10, 1994, the report signed by Pathologist Cassell who diagnoses pleural plaque from the chest wall and diaphragm.



Goldberg, Perskv, Jenninas & White, P.C.

Re:

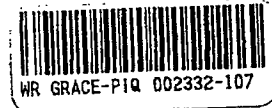
September 10, 1997

Page 2 of 5

REDACTED

Following a review of these slides, I prepared two photomicrographs depicting the pleural plaque.

2. The thoracotomy and pleural decortication procedure resulting in the preceding tissue specimen was preceded on March 22, 1994 with a fine needle aspiration biopsy of what was suspected to be a right pleural lesion. The biopsy report, 94S-539, is accompanied by three slides which are non-diagnostic and negative.
3. A bronchoscopy was also performed, bronchial washings and cell block evaluated on three slides, 94-C-1177. The three slides have been reviewed and read as negative for malignancy.
4. A surgical pathology report 95S-1783 dated August 16, 1995 where three skin lesion have been removed, all being diagnosed as benign without evidence of malignancy by Pathologist Cassell. Slides corresponding to this report are not received.
5. A surgical pathology report 95S-2818, without accompanying slides representing a sigmoid colon segment where there is a moderately well-differentiated adenocarcinoma invading the submucosa but not the underlying muscle. Lymph nodes are negative.
6. A surgical pathology report 96S-1902 dated August 23, 1996 where the two-part specimen consists of a hyperplastic polyp and an ileocecal valve biopsy showing non-specific inflammation.
7. A surgical pathology report dated December 5, 1995 received in two parts, the first being a sigmoid colon polyp; and the second a biopsy of the descending colon where the diagnosis of malignancy was initially made on December 6, 1995. Slides have not been received relative to this biopsy.
8. A surgical pathology report 95S-2427 representing gastric biopsies on October 27, 1995, the biopsies



Goldberg, Persky, Jennings & White, P.C.

Re:  
September 10, 1997  
Page 3 of 5

REDACTED

being read by Pathologist Cassell as showing moderate inflammation, but no evidence of malignancy. Slides do not accompany this gastric biopsy.

Unfortunately, lung parenchyma is not available for study in the thoracotomy specimen and therefore, I cannot confirm or exclude the presence of asbestos bodies or parenchymal fibrosis on pathological grounds.

The photomicrographs mentioned above have been taken in duplicate and one set is included with this report for your use.

Based on these reviews and studies, the following are noted to be the pertinent medical facts in this case:

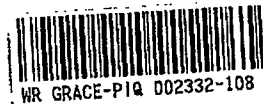
REDACTED

1. was an 80 year old male when he underwent a right thoracotomy for partial pleural decortication on May 10, 1994. The surgical procedure resulted in the identification of thick, dense, pleural plaque on the right side, which was initially considered to be either carcinoma or a mesothelioma. The suspected pulmonary nodule which led to this thoracotomy was subjected to a fine needle aspiration biopsy and the bronchoscopy, both procedures, however, being negative and my own review of the fine needle aspiration biopsy and the bronchoscopic washings leads me to confirm the fact that there is no evidence of malignancy.

The thoracotomy resulting in the submission of pleural plaque tissue for an evaluation on 94S-847 showed multiple pieces of a rubbery, thick, soft tissue which microscopically, showed classical pleural plaque, both with and without calcific change. Doctor Cassell correctly identifies these structures considered to be both radiological and pathological markers of asbestos exposure. There is no evidence of malignancy.

2. An ILO B Reader report by Doctor Ray Harron shows





Goldberg, Perskv. Jennings & White, P.C.

Re:

September 10, 1997

Page 4 of 5

REDACTED

pleural changes consistent with asbestosis in that there is right and bilateral diaphragmatic pleural plaque formation.

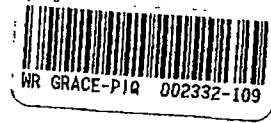
3. A pulmonary function study performed prior to the thoracotomy shows possible, mild, restrictive ventilatory defect and a superimposed, early, obstructive pulmonary defect. There is also a moderate diffusion defect. These features are consistent with asbestosis.

REDACTED

4. Your letter to me indicates that <sup>was</sup> occupationally exposed to asbestos fiber inhalation between 1945 and 1971 while working as a bricklayer. During this time, he had continuous exposure to asbestos doing the various, documented jobs. He was exposed both directly and indirectly to asbestos.
5. Also of significance is the fact that <sup>was</sup> a cigarette smoker having smoked a half pack of cigarettes per day from 1930 to 1991.
6. A past history indicates that previous surgical procedures included a right hip replacement in 1984 and a transurethral resection of his prostate the same year. He also, at that time, had an umbilical herniorrhaphy and a left inguinal herniorrhaphy.
7. A surgical pathology report dated December 11, 1995, 95S-2818, describes a segment of sigmoid colon which displays a moderately differentiated adenocarcinoma invading the submucosa and where there are six negative regional lymph nodes. Doctor Cassell notes that the margins of resection are clear. A follow-up since that time shows no apparent tumor metastasis or progression.

My opinions and conclusions, therefore, based with a reasonable degree of medical certainty on the observations and studies recorded above are as follows:

1. <sup>is an 82 year old male who has</sup> undergone a surgical decortication procedure to



Goldberg, Persky, Jennings & White, P.C.

Re:

September 10, 1997

Page 5 of 5

REDACTED

remove pleural plaque which is considered to be a radiological and pathological marker of asbestos exposure.

REDACTED

2. has a documented colon cancer which has been surgically excised about twenty months ago. Prognosis is guarded.
3. In addition to colon cancer recurrence, is at significantly increased risk for the development of a lung cancer and also for the development of malignant mesothelioma of either pleura or peritoneum.
4. It is recognized and established in the medical literature that asbestos exposure causes lung cancer and also malignant mesothelioma and many observers conclude that there is a three times greater risk of developing colon cancer in people who are heavily exposed to asbestos. A close follow up is indicated to monitor for the development of these possible malignancies and the potential recurrence of the colon cancer.

Thank you for submitting this case to me for review. Please let me know if there is any additional information I can provide. The slides and blocks are being returned to you along with two photomicrographs depicting classical pleural plaque.

Sincerely,

Jaywant P. Parmar, MD, FCAP, BCFM  
Chairman and Medical Director Pathology Department  
Ohio Valley Medical Center

JPP:sjv



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**JAYWANT P. PARMAR, MD, INC.**  
CONSULTATION IN PATHOLOGY

September 23, 1997

953 NATIONAL RD.  
SUITE 208  
WHEELING, WV 26003

PHONE 304-234-1899  
FAX 304-234-1849

Ms. Susan E. Jurik  
Legal/Medical Records Assistant  
Goldberg, Persky, Jennings & White, P.C.  
Plaza North  
4800 Fashion Square Boulevard, Suite 260  
Saginaw, MI 48604-2602

RE: Addendum Report

REDACTED

Dear Ms. Jurik:

This letter is being sent as clarification relative to my previous report dated September 10, 1997.

As documented pathologically, [redacted] has had a colectomy in December of 1995 for a moderately well-differentiated adenocarcinoma with six negative regional nodes. A major and significant cause for the development of this colon cancer is his occupational exposure to asbestos fiber inhalation while working as a bricklayer between 1945 and 1971. Pathological evidence of asbestos exposure is documented in the demonstration of bilateral calcified pleural plaques also surgically removed following a decortication procedure.

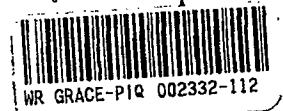
As a conclusion, I have stated in my previous report that colon cancer is related to asbestos exposure and there is up to a three times greater risk for developing colon cancer in people who are heavily exposed to asbestos as compared to the general non-exposed population.

Please let me know if there is any additional information you require.

Sincerely,

*Jaywant P. Parmar*  
Jaywant P. Parmar, MD, FACP, BCFM  
Chairman and Medical Director Pathology Department  
Ohio Valley Medical Center

[illegible]



ASBESTOS DOCKET

STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF BAY

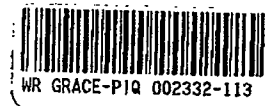
REDACTED

Case No. 97-3160-NP-S

Plaintiff,

vs.

20TH CENTURY GLOVE CORP. OF TEXAS, a/k/a GUARD LINE, INC., a Texas corporation;  
A-BEST PRODUCTS COMPANY, an Ohio corporation;  
ACME INSULATIONS, INCORPORATED, a Michigan corporation;  
ALEXANDER STAFFORD CORPORATION, a Michigan corporation;  
AMERICAN OPTICAL CORPORATION, a Delaware corporation;  
ANCHOR PACKING COMPANY, a Delaware corporation;  
ARGO PACKING COMPANY, a Pennsylvania corporation;  
ATLAS TURNER, INC., f/k/a ATLAS ASBESTOS COMPANY, a Canadian corporation;  
AUSTIN COMPANY, an Ohio corporation;  
BASIC, INCORPORATED, a Delaware corporation;  
BAY CITY HARDWARE COMPANY, a Michigan corporation;  
BIGELOW-LIPTAK CORPORATION, a Michigan corporation;  
THE CARBORUNDUM COMPANY, a Delaware corporation;  
CHICAGO FIREBRICK CO., a Delaware corporation;  
COON DEVISSEY COMPANY, a Michigan corporation;  
CORHART REFRACTORIES COMPANY GLASS REFRACTORIES, a Delaware corporation;  
CROWN CORK & SEAL COMPANY, a New York corporation;  
DRESSER INDUSTRIES, INC., f/k/a HARBISON AND WALKER REFRACTORIES, a Delaware corporation;  
DURABLA MANUFACTURING COMPANY, a foreign corporation;  
F.B. WRIGHT CO., a Michigan corporation;  
FOSECO, INC., a Delaware corporation, in its own right and as successor to GIBSON-HOMANS CO., BALTIMORE ENNIS LAND CO., INC., and as Subsidiary of FOSECO PLC;  
FOSTER WHEELER CORPORATION, a New York corporation;  
GARLOCK INC., an Ohio corporation;  
GENERAL ELECTRIC COMPANY, a New York corporation;  
GENERAL REFRACTORIES, COMPANY, a foreign corporation;  
GRANT WILSON, INCORPORATED, an Illinois corporation;  
HARRISON PIPING SUPPLY COMPANY, a Michigan corporation;  
HERCULES CHEMICAL CORPORATION, a Delaware corporation;  
HI-TEMP PRODUCTS, INC., f/k/a ASBESTOS SPECIALITIES CO., a Michigan corporation;  
HOLLINGER & CO., a Michigan corporation;  
J.H. FRANCE REFRACTORIES COMPANY, a Pennsylvania corporation;  
JENNISON HARDWARE COMPANY, a Michigan corporation;  
JOHN CRANE-HOUDAILLE, INC., a Delaware corporation, in its own right and as successor to CRANE PACKING COMPANY, an Illinois



corporation;

JOHN E. GREEN COMPANY, a Michigan corporation;

KAISER ALUMINUM AND CHEMICAL CORPORATION, in its own right and as successor to KAISER REFRACTORIES a Division of KAISER ALUMINUM, a Delaware corporation;

METROPOLITAN LIFE INSURANCE COMPANY, a Delaware corporation a/k/a METROPOLITAN INSURANCE COMPANY;

M.H. DETRICK COMPANY, a Delaware corporation;

MIDLAND ROSS CORPORATION, an Ohio corporation;

NL INDUSTRIES INC., f/k/a NATIONAL LEAD COMPANY, in its own right and as successor in interest to CHAS. TAYLOR SONS CO., and as contractually responsible for the liabilities of CHAS. TAYLOR SONS CO.

NORTH AMERICAN REFRACTORIES COMPANY, an Ohio corporation;

OGLEBAY NORTON COMPANY, a Delaware corporation, and its division, FERRO ENGINEERING;

OWENS-CORNING FIBERGLAS CORPORATION, a Delaware corporation;

OWENS-ILLINOIS, INC., an Ohio corporation;

PITTSBURGH CORNING CORPORATION, a Pennsylvania corporation;

PLIBRICO COMPANY, a Delaware corporation;

RAPID-AMERICAN CORPORATION, a Delaware corporation, in its own right and as successor to PHILIP CAREY MANUFACTURING COMPANY, and to PANACON CORPORATION, and to PHILIP CAREY CORPORATION;

REX/ROTO CORPORATION, a Michigan corporation;

RUTLAND FIRE CLAY COMPANY, a Vermont corporation;

SCHAD BOILER SETTING COMPANY, D/B/A SCHAD REFRACTORY CONSTRUCTION COMPANY, a Michigan corporation;

STANDARD FUEL ENGINEERING COMPANY, a Delaware corporation;

THIEM CORPORATION, a Delaware corporation;

TOWNSEND & BOTTUM, INC., a Michigan corporation;

UNIROYAL, INC., a New Jersey corporation, a/k/a UNITED STATES RUBBER COMPANY, INC.;

UNITED STATES MINERAL PRODUCTS CO., a/k/a UNITED STATES MINERAL PRODUCTS COMPANY, f/k/a UNITED STATES MINERAL WOOL COMPANY, a New Jersey corp., in its own right and as successor to and/or f/k/a COLUMBIA ACOUSTICS AND FIREPROOFING COMPANY;

W.R. GRACE & CO., a Connecticut corporation, in its own right and as successor to ZONOLITE CO., a foreign corporation;

A.P. GREEN REFRACTORIES CO., a Delaware corporation;

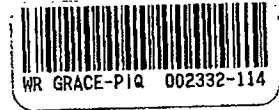
ARMSTRONG WORLD INDUSTRIES, INC., f/k/a ARMSTRONG CORK COMPANY, a Pennsylvania corporation;

ASBESTOS CLAIMS MANAGEMENT CORPORATION f/k/a NATIONAL GYPSUM COMPANY, a Delaware corporation;

FLEXITALLIC GASKET COMPANY, INC., a Connecticut corporation;

GAF CORPORATION, a Delaware corporation, in its own right and as successor to THE RUBEROID COMPANY;

UNITED STATES GYPSUM COMPANY, a Delaware corporation, in its own right and as successor in interest to U.S. GYPSUM COMPANY, an Illinois corporation;



Jointly and severally,

Defendants. .

\_\_\_\_\_  
GOLDBERG, PERSKY,  
JENNINGS & WHITE, P.C.  
Attorneys for Plaintiff  
By: Joel Persky (P41160)  
Lane A. Clack (P38835)  
\_\_\_\_\_

PLAINTIFF'S AMENDED COMPLAINT AND CAPTION

There is no other pending or resolved civil action arising out of the transaction or occurrence alleged in the complaint.

NOW COMES Plaintiff by and through his respective counsel state for his Complaint as follows:

GENERAL ALLEGATIONS

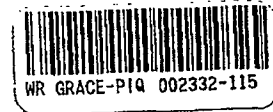
1. That all or part of this cause of action arose in the County of Bay, State of Michigan. REDACTED

2. That the Plaintiff, during the times herein mentioned and complained of, to-wit: from 1945 to 1971 was a resident of the State of Michigan, presently residing at

REDACTED, and that the significant injurious exposures to asbestos took place as a result of asbestos fiber released at job sites located within Bay County, within the State of Michigan.

3. That Plaintiff has contracted Mesothelioma and/or other asbestos related diseases as a result of exposure to asbestos.

4. That Plaintiff says that during the years 1945 to 1971, Plaintiff was employed as a Bricklayer, and that in the course of his duties in such capacities, he was required to handle and



otherwise be exposed to and come into contact with large quantities of asbestos dust and fibers mined, produced, installed, prescribed, engineered, specified, licensed, sold and/or distributed by the above named defendants, installed and/or being installed and/or used in his work environs. That in addition to the fact that Plaintiff, **REDACTED** actually removed, applied, and otherwise used some of the products mined, produced, specified, manufactured, prescribed, engineered, distributed, installed, licensed and/or sold by the above named defendants, and specifically many and various construction products containing asbestos, Plaintiff says that on many jobs, while Plaintiff did not use the specific products mined, produced, manufactured, prescribed, engineered, distributed, specified, installed, licensed and/or sold by Defendants, Plaintiff was nevertheless exposed to the dangerous materials, and especially, asbestos fibers from such products which were used by his employers or by other workers on job sites serviced by the Plaintiff in his aforesaid vocations.

5. That during the period of time in which Plaintiff was employed as a Bricklayer, from on or about the years 1945 to 1971, in the course of his employment, due to the negligence and carelessness of the Defendants, he was caused to come in contact with the said asbestos products specified, mined, produced, engineered, manufactured, licensed, installed, distributed and/or sold by the defendants, and directly in consequence of said negligence and carelessness of the defendants, did sustain severe, permanent and disabling injuries, resulting in total, permanent and





progressive disability, and a serious impairment of his earning capacity.

6. That venue is proper in Bay County because at least one Defendant resides or has a place of business, or conducts business in said county or has a registered office in said county, or pursuant to other facts and circumstances satisfies the requirements of MCLA §600.1621, 600.1627, and 600.1629.

7. That all Defendants are subject to the jurisdiction of the State of Michigan by virtue of their activities within this State.

8. The amount in controversy exceeds Ten Thousand (\$10,000.00) Dollars exclusive of costs, interest and attorneys fees.

9. Plaintiff consents to jurisdiction in the State of Michigan.



COUNT I

NEGLIGENCE

10. Plaintiff hereby incorporates and adopts by reference all allegations in all Counts of this Complaint as if set out in full.

11. At all times and places mentioned herein, Defendants were miners, millers, manufacturers, distributors, processors, importers, convertors, compounders, merchants and promoters of asbestos and asbestos-containing products.

12. Plaintiff has been exposed to asbestos-containing products of Defendants, which Plaintiff inhaled or otherwise ingested.

13. Plaintiff's exposures were foreseeable by Defendants.

14. At all times material hereto, Defendants, jointly and severally, owed a duty to Plaintiff and to all others similarly situated, to design, manufacture, formulate, develop standards, prepare, process, inspect, test, market, advertise, package and label the above-mentioned products in a manner reasonably calculated to permit said asbestos products to be used without endangering the health and safety of persons such as the Plaintiff in the use of such products. Furthermore, Defendants owed a duty to warn and instruct regarding the use of such products.

15. Defendants, jointly and severally, breached their duty to Plaintiff in the following particulars:

a. failed to adequately warn Plaintiff of the dangerous characteristics of asbestos and asbestos-containing products;

b. failed to provide Plaintiff with information as to



what would be reasonably safe and sufficient wearing apparel and proper protective equipment and appliances, to protect Plaintiff from being harmed and disabled by exposure to asbestos and asbestos containing materials;

c. failed to place adequate warnings on containers of said asbestos and asbestos-containing materials to warn of the health hazards associated with coming into contact with said asbestos and asbestos-containing materials;

d. failed to take reasonable precaution or exercise reasonable care to publish, adopt and enforce safety plans and/or a safe method of handling and installing asbestos and asbestos-containing materials;

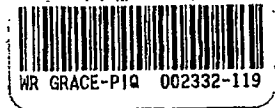
e. failed to adopt and utilize a substitute material to eliminate asbestos fibers in the products produced;

f. failed to test asbestos and asbestos-containing materials to determine their disease causing propensities prior to releasing these products for sale and, if in fact any Defendant tested these products, then said Defendants were negligent in concealing the results from the public;

g. failed to properly design and manufacture the products;

h. failed to formulate the products so as to minimize or eliminate their toxic effects upon their users;

i. failed to properly prepare, inspect and process said products so that they would not be transferred from the manufacturers' possession in a defective state and that said



products would be reasonably fit for the particular purpose intended and of merchantable quality;

j. failed to properly prepare, process and manufacture the products;

k. failed to properly package the products;

l. failed to adequately label and give adequate warnings and instructions regarding the composition and use of the products and their possible toxic affects upon their users;

m. failed to properly market and advertise said products;

n. failed to advise and warn of the scientifically recognized synergism between exposure to asbestos in conjunction with smoking, alcohol and other agents;

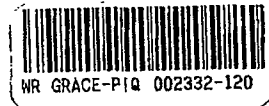
o. failed to act in a reasonable and prudent manner.

16. As a direct and proximate result of Defendants' aforementioned tortious acts, Plaintiff has sustained serious, incurable and progressive asbestos related disease.

17. Plaintiff has contracted an asbestos related disease and suffers other bodily injuries including great pain of mind and body, shock, disgrace, outrage, humiliation, indignity, disability, loss of the joys, pleasures and vitalities of life and will continue to do so into the future.

18. Plaintiff is at great risk or has developed lung cancer, and/or mesothelioma, and/or other malignant cancers and as a result is extremely fearful of developing such cancers.

19. Plaintiff experiences severe mental anguish regarding his



greater risk of developing numerous forms of cancer and/or progressive shortness of breath.

20. That as a result of Plaintiff's asbestos related condition, he/she is substantially at risk of premature death and as a result suffers from great pain of mind and body..

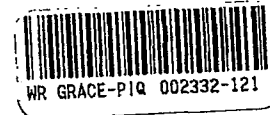
21. Plaintiff incurred medical bills and other expenses and will continue to do so in the future.

22. Plaintiff sustained wage losses and will continue to sustain wage losses in an undetermined amount, which amount will be demonstrated at trial.

23. Plaintiff suffers from such other injuries and damages as hereinabove set forth.

24. Defendants are jointly and severally liable to Plaintiff for injuries and damages.

WHEREFORE, Plaintiff prays for a judgment against Defendants of actual, consequential, and exemplary damages in whatever amount in excess of Ten Thousand (\$10,000.00) Dollars Plaintiff is deemed to be entitled by this Honorable Court and/or Jury, together with costs, interest and attorneys fees.



COUNT II

CONCERT OF ACTION

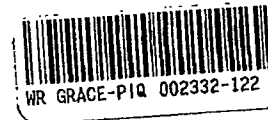
25. Plaintiff hereby incorporates and adopts by reference all allegations in all Counts of this Complaint as if set out in full.

26. That at all times herein mentioned one, several or all of the Defendants named above, their officers, directors, employees, agents or servants acting on their behalf, engaged in concerted activities, namely express or implied agreements regarding the mining, milling, manufacturing, designing, engineering, licensing, producing, assembling, marketing, supplying, installing, delivering, promoting, and/or retarding the development of industry wide standards relating to the use of asbestos and asbestos-containing products which Defendants knew, or in the exercise of reasonable care, should have known, were deleterious, poisonous, and highly harmful to Plaintiff.

27. Plaintiff may not be able to identify all of the asbestos containing products of the various Defendants due to the generic similarity of such products as produced as promoted by these Defendants.

28. That as a result of the said concerted activities in which Defendants engaged, the Plaintiff was injured through the use and/or exposure to asbestos or asbestos-containing products of Defendants.

29. That due to the concert of action among each of the various Defendants, each is liable to the Plaintiff for injuries sustained even if there was no direct exposure to, and use of,



products produced by a particular Defendant.

30. Defendants are jointly and severally liable to the Plaintiff for the injuries and damages sustained by Plaintiff.

31. As a direct and proximate result of Defendants aforementioned tortious acts, Plaintiff has sustained serious, incurable and progressive asbestos related disease.

32. Plaintiff has contracted an asbestos related disease and suffered other bodily injuries including great pain of mind and body, shock, disgrace, outrage, humiliation, and indignity and will continue to do so into the future.

33. Plaintiff is at great risk to or has developed lung cancer, and/or mesothelioma and/or other malignant cancers and as a result is extremely fearful of developing such cancers.

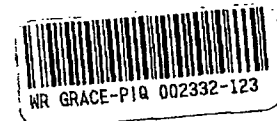
34. Plaintiff experiences severe mental anguish regarding his greater risk to develop numerous forms of cancer and/or progressive shortness of breath.

35. That as a result of Plaintiff's asbestos related condition he/she is substantially at risk of a premature death and as a result suffers from great pain of mind and body.

36. Plaintiff incurred medical bills and other expenses and will continue to do so in the future.

37. Plaintiff sustained wage losses and will continue to sustain wage losses in an undetermined amount, which amount will be demonstrated at trial.

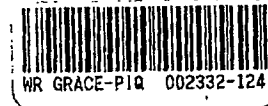
38. Plaintiff suffers from such other injuries and damages as hereinabove set forth.



39. Defendants are jointly and severally liable to Plaintiff for injuries and damages.

WHEREFORE, Plaintiff prays for a judgment against Defendants of actual, consequential, and exemplary damages in whatever amount in excess of Ten Thousand (\$10,000.00) Dollars Plaintiff is deemed to be entitled by this Honorable Court and/or Jury, together with costs, interest and attorneys fees.





COUNT III

CONSPIRACY

40. Plaintiff hereby incorporates and adopts by reference all allegations in all Counts of this Complaint as if set out in full.

41. The Defendants did conspire by willfully and wantonly placing into the stream of commerce instrumentalities which they knew or reasonably should have known would cause unlawful, serious and permanent bodily injury or death to Plaintiff or others similarly situated.

42. Many decades ago the Defendants became aware that asbestos would cause serious, debilitating, life shortening and life ending health problems.

43. Notwithstanding said knowledge in the possession of the Defendants they knowingly, maliciously, wantonly and for mercenary reasons, entered into an agreement tacit or otherwise, to conceal said knowledge and further, did agree to continue on as vendors of asbestos and asbestos-containing products thereby furthering the ends of their conspiracy.

44. That this agreement and course of conduct on the part of the several Defendants originated in the period of 1930, or earlier, and has continued to the present.

45. That each Defendant at some time relevant to Plaintiff's cause of action, acted in furtherance of said conspiracy.

46. Pursuant to the conspiracy between the several Defendants, they retained control of the existing and developing markets, retarded the development of industry wide standards and



through products which they knew were hazardous , feloniously caused great bodily harm and/or death.

47. As a direct and proximate result of Defendants' aforementioned tortious and illegal acts, Plaintiff has sustained serious, incurable and progressive asbestos related disease.

48. Plaintiff has contracted an asbestos related disease and suffered other bodily injuries including great pain of mind and body, shock, disgrace, outrage, humiliation and indignity and will continue to do so into the future.

49. Plaintiff is a great risk to or has developed lung cancer, and/or mesothelioma and/or other malignant cancers and as a result is extremely fearful of developing cancers.

50. Plaintiff experiences severe mental anguish regarding his greater risk of developing numerous forms of cancer and/or progressive shortness of breath.

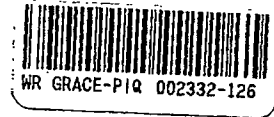
51. That as a result of Plaintiff's asbestos related condition he is substantially at risk of a premature death and as a result suffers from great pain of mind and body.

52. Plaintiff incurred medical bills and other expenses and will continue to do so in the future.

53. Plaintiff sustained wage losses and will continue to sustain wage losses in an undetermined amount, which amount will be demonstrated at trial.

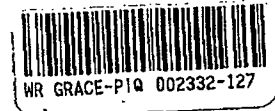
54. Plaintiff suffers from such other injuries and damages as hereinabove set forth.

55. Defendants are jointly and severally liable to Plaintiff



for injuries and damages.

WHEREFORE, Plaintiff prays for a judgment against Defendants of actual, consequential, and exemplary damages in whatever amount in excess of Ten Thousand (\$10,000.00) Dollars Plaintiff is deemed to be entitled by this Honorable Court and/or Jury, together with costs, interest and attorneys fees.



COUNT IV

ALTERNATIVE LIABILITY

56. Plaintiff hereby incorporates and adopts by reference all allegations in all Counts of this Complaint as if set out in full.

57. Defendants, acting independently have concurrently breached a duty owed to Plaintiff in their manufacture, design, selection, assembly, marketing, distribution, sale, supply, delivery and promotion of asbestos-containing products which were generically similar and fungible in nature.

58. Defendants, acting independently and concurrently each breached the same duty to Plaintiff by contributing to the placement of asbestos-containing products into the stream of interstate commerce, which products were independently the direct and proximate cause of the injuries and damages sustained by Plaintiff.

59. Plaintiff is unable to identify the specific Defendant responsible for placing specific asbestos or asbestos-containing products into the stream of commerce.

60. Defendants were each in a position to mitigate and alleviate the danger to Plaintiff from exposure to the asbestos-containing products produced and promoted by each of them, but each Defendant, independently and concurrently failed to so mitigate that risk.

61. Defendants are jointly and severally liable to Plaintiff, for the injuries and damages.

62. As a direct and proximate result of aforementioned



tortious acts, Plaintiff has sustained serious, incurable and progressive asbestos related disease.

63. Plaintiff has contracted an asbestos related disease and suffered other bodily injuries including great pain of mind and body, shock, disgrace, outrage, humiliation and indignity and will continue to do so into the future.

64. Plaintiff is a great risk to or has developed lung cancer, and/or mesothelioma and/or other malignant cancers and as a result is extremely fearful of developing cancers.

65. Plaintiff experiences severe mental anguish regarding his greater risk of developing numerous forms of cancer and/or progressive shortness of breath.

66. That as a result of Plaintiff's asbestos related condition he is substantially at risk of a premature death and as a result suffers from great pain of mind and body.

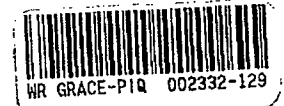
67. Plaintiff incurred medical bills and other expenses and will continue to do so in the future.

68. Plaintiff sustained wage losses and will continue to sustain wage losses in an undetermined amount, which amount will be demonstrated at trial.

69. Plaintiff suffers from such other injuries and damages as hereinabove set forth.

70. Defendants are jointly and severally liable to Plaintiff for injuries and damages.

WHEREFORE, Plaintiff prays for a judgment against Defendants of actual, consequential, and exemplary damages in whatever amount.



in excess of Ten Thousand (\$10,000.00) Dollars Plaintiff is deemed to be entitled by this Honorable Court and/or Jury, together with costs, interest and attorneys fees.



COUNT V

ENTERPRISE LIABILITY

71. Plaintiff hereby incorporates and adopts by reference all allegations in all Counts of this Complaint as if set out in full.

72. That all Defendants herein agreed to or independently adhered to an industry wide practice or custom not to warn of the dangers of asbestos.

73. Plaintiff cannot identify the specific Defendant responsible for the asbestos products to which he was exposed.

74. Plaintiff's injuries and damages complained of were directly and proximately caused by exposure to asbestos-containing products produced and/or promoted by the several Defendants under and in adherence to said insufficient and inadequate industry wide standards.

75. The several Defendants, controlled various shares of the asbestos industry market within the geographical region in which Plaintiff was employed.

76. Defendants are jointly liable to Plaintiff for injuries and damages sustained.

77. As a direct and proximate result of aforementioned tortious acts, Plaintiff has sustained serious, incurable and progressive asbestos related disease.

78. Plaintiff has contracted an asbestos related disease and suffered other bodily injuries including great pain of mind and body, shock, disgrace, outrage, humiliation and indignity and will continue to do so into the future.



79. Plaintiff is a great risk to or has developed lung cancer, and/or mesothelioma and/or other malignant cancers and as a result is extremely fearful of developing cancers.

80. Plaintiff experiences severe mental anguish regarding his greater risk of developing numerous forms of cancer and/or progressive shortness of breath.

81. That as a result of Plaintiff's asbestos related condition he is substantially at risk of a premature death and as a result suffers from great pain of mind and body.

82. Plaintiff incurred medical bills and other expenses and will continue to do so in the future.

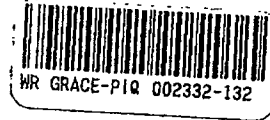
83. Plaintiff sustained wage losses and will continue to sustain wage losses in an undetermined amount, which amount will be demonstrated at trial.

84. Plaintiff suffers from such other injuries and damages as hereinabove set forth.

85. Defendants are jointly and severally liable to Plaintiff for injuries and damages.

WHEREFORE, Plaintiff prays for a judgment against Defendants of actual, consequential, and exemplary damages in whatever amount in excess of Ten Thousand (\$10,000.00) Dollars Plaintiff is deemed to be entitled by this Honorable Court and/or Jury, together with costs, interest and attorneys fees.





COUNT VI

STRICT LIABILITY

86. Plaintiff hereby incorporates and adopts by reference all allegations in all Counts of this Complaint as if set out in full.

87. At all times and places mentioned herein, Defendants collectively and individually were engaged in the asbestos industry.

88. The asbestos and asbestos-containing products manufactured, designed, assembled, maintained for sale, marketed, distributed, sold, supplied, delivered and promoted by Defendants wa used by Plaintiff and those similarly situated in a foreseeable manner.

89. At all times pertinent hereto, the said asbestos products were unreasonably dangerous and in a defective condition.

90. Defendants' unreasonably dangerous and defective products were a direct and proximate cause of the injuries sustained by Plaintiff.

91. Defendants are jointly and severally strictly liable to the Plaintiff for injuries and damages.

92. As a direct and proximate result of aforementioned tortious acts, Plaintiff has sustained serious, incurable and progressive asbestos related disease.

93. Plaintiff has contracted an asbestos related disease and suffered other bodily injuries including great pain of mind and body, shock, disgrace, outrage, humiliation and indignity and will continue to do so into the future:



94. Plaintiff is a great risk to or has developed lung cancer, and/or mesothelioma and/or other malignant cancers and as a result is extremely fearful of developing cancers.

95. Plaintiff experiences severe mental anguish regarding his greater risk of developing numerous forms of cancer and/or progressive shortness of breath.

96. That as a result of Plaintiff's asbestos related condition he is substantially at risk of a premature death and as a result suffers from great pain of mind and body.

97. Plaintiff incurred medical bills and other expenses and will continue to do so in the future.

98. Plaintiff sustained wage losses and will continue to sustain wage losses in an undetermined amount, which amount will be demonstrated at trial.

99. Plaintiff suffers from such other injuries and damages as hereinabove set forth.

100. Defendants are jointly and severally liable to Plaintiff for injuries and damages.

WHEREFORE, Plaintiff prays for a judgment against Defendants of actual, consequential, and exemplary damages in whatever amount in excess of Ten Thousand (\$10,000.00) Dollars Plaintiff is deemed to be entitled by this Honorable Court and/or Jury, together with costs, interest and attorneys fees.



COUNT VII


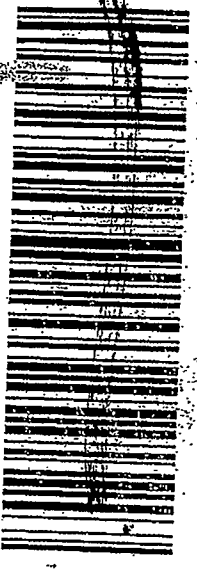

WARRANTY

101. Plaintiff hereby incorporates and adopts by reference all allegations in all Counts of This Complaint as if set out in full.

102. The Defendants herein, jointly and severally owe the Plaintiff a contractual duty to dispense a product which comported with the implied or express warranties attached to said product. The warranties which were attached to Defendant's products at the time of manufacture, design, distribution, sale, supply, delivery, marketing and promotion of asbestos-containing products, were that said products are:

- a. of good and merchantable quality;
- b. properly designed and manufactured;
- c. fit for the ordinary purposes for which such goods are/were used;
- d. adequately contained;
- e. adequately packaged;
- f. adequately labeled;
- g. conformed to the promises or affirmation of fact made on the container, labeling, advertising, product specification data or informational literature;
- h. fit for the particular and intended purpose for which the goods are required, the buyer having relied upon Defendants' judgment in selecting and furnishing suitable goods.

103. That notwithstanding said duty the Defendants, jointly and severally, did violate same in that their products:

<b>17 LB</b>		<b>1 OR 10 DNI ddt HS S 13 10 13</b>	
<b>FROM:</b> MATT HOOVER (989) 789-4848 GOLDEN RING, PERSKY & WHITE, P.C. 4800 FASHION SQUARE BOULEVARD SAGINAW MI 48604-2802		<b>MN 550 2-01</b> 	
<b>SHIP TO:</b> W.R. GRACE & CO. BANKRUPTCY RUST CONSULTING, INC. 201 S. LYNDAL AVE. FARIBAULT MN 55021		<b>UPS GROUND</b> TRACKING #: 1Z 457 EW3 03 5457 4434 	
REF 1: MLH Bank R REF 2: WR Grace		BILLING: P/P	
<b>RECEIVED JAN 16 2006</b>			
<b>WR GRACE-PIQ 002332-141</b>  UOW 8.014 hp usenet 1.42.0			
Fold here and place in label pouch			